

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL D. COHEN,

*Petitioner,*

v.

WILLIAM BARR, in his official capacity as Attorney General of the United States, MICHAEL CARVAJAL, in his official capacity as Director of the Bureau of Prisons, and JAMES PETRUCCI, in his official capacity as Warden of the Federal Correctional Institution, Otisville,

*Respondents.*

No. 20 Civ. 5614

**NOTICE OF PETITIONER'S EMERGENCY MOTION  
FOR A TEMPORARY RESTRAINING ORDER**

PLEASE TAKE NOTICE that on July 20, 2020, or as soon thereafter as counsel may be heard, the undersigned attorneys for Petitioner will move before the U.S. District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, New York, New York, for entry of a Temporary Restraining Order, pursuant to Federal Rule of Civil Procedure 65.

PLEASE TAKE FURTHER NOTICE that, in support of their Motion, Petitioners shall rely on the Verified Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 (ECF No. 1), the accompanying Memorandum of Law, and the Declarations of Michael D. Cohen, E. Danya Perry, and Jeffrey K. Levine, and the exhibits thereto.

Dated: July 20, 2020  
New York, New York

Respectfully submitted,

/s/ E. Danya Perry  
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*Attorneys for Petitioner Michael D. Cohen*

*\* Pro hac vice application forthcoming*

**CERTIFICATE OF SERVICE**

I, E. Danya Perry, certify that on July 20, 2020, I caused the foregoing Notice of Petitioner's Emergency Motion for Temporary Restraining Order to be filed with the Clerk of the Court and served upon counsel via email and the CM/ECF system.

/s/ E. Danya Perry

E. Danya Perry